

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE, et al.,

Defendants.

Case No. 1:25-cv-345

NOTICE OF AUTHORITY

Plaintiff States write to provide the Court with authority discussed at the August 20, 2025, hearing on Plaintiffs' Motion for a Preliminary Injunction.

Enclosed is a January 14, 1997 Memorandum Opinion from the Department of Justice, Office of Legal Counsel. The discussion referenced by counsel at the hearing appears at pages 29-30.

The two recent decisions ordering preliminary injunctions based on violations of notice and comment requirements are: *Maryland v. Corp. for Nat'l & Cmty. Serv.*, No. CV DLB-25-1363, 2025 WL 1585051, at *29-32 (D. Md. June 5, 2025), and *Massachusetts v. Nat'l Institutes of Health*, 770 F. Supp. 3d 277, 311-16 (D. Mass. 2025).

Dated: August 21, 2025

LETITIA JAMES

Attorney General for the State of New York

By: /s/ Rabia Muqaddam

Rabia Muqaddam*

Chief Counsel for Federal Initiatives

Jessica Ranucci*

Special Counsel

Zoe Levine*

Special Counsel for Immigrant Justice

28 Liberty St.

New York, NY 10005

(929) 638-0447

rabia.muqaddam@ag.ny.gov

zoe.levine@ag.ny.gov

jessica.ranucci@ag.ny.gov

Attorneys for the State of New York

PETER F. NERONHA

Attorney General for the State of Rhode Island

By: /s/ Sarah W. Rice

Sarah W. Rice (RI No. 10588)

Stephen N. Provazza (RI No. 10435)

Unit Chief, Consumer & Economic Justice

Unit

150 South Main St.

Providence, RI 02903

Phone: 401-274-4400

SRice@riag.ri.gov

SProvazza@riag.ri.gov

Attorneys for the State of Rhode Island

PHILIP J. WEISER

Attorney General for the State of Colorado

By: /s/ David Moskowitz

Respectfully submitted,

NICHOLAS W. BROWN

Attorney General of Washington

By: /s/ Andrew Hughes

Andrew Hughes*

Benjamin Seel*

Zane Muller*

Assistant Attorneys General

Cristina Sepe*

Deputy Solicitor General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104-3188

(206) 464-7744

Andrew.Hughes@atg.wa.gov

Benjamin.Seel@atg.wa.gov

Zane.Muller@atg.wa.gov

Cristina.Sepe@atg.wa.gov

Attorneys for the State of Washington

KRISTIN K. MAYES

Attorney General for the State of Arizona

By: /s/ Hayleigh S. Crawford

Hayleigh S. Crawford*

Mary M. Curtin*

2005 North Central Avenue

Phoenix, Arizona 85004

Phone: (602) 542-3333

Hayleigh.Crawford@azag.gov

Mary.Curtin@azag.gov

ACL@azag.gov

Attorneys for the State of Arizona

ROB BONTA

Attorney General for the State of California

By: /s/ Heidi Lehrman

David Moskowitz*
Deputy Solicitor General
Jennifer L. Sullivan*
Deputy Attorney General
Colorado Department of Law
1300 Broadway, 10th Floor
Denver, CO 80203
Phone: (720) 508-6000
david.moskowitz@coag.gov
jen.sullivan@coag.gov

Attorneys for the State of Colorado

Heidi Lehrman*
Neli Palma*
Michael L. Newman
Senior Assistant Attorneys General
Kathleen Boergers*
Srividya Panchalam*
Supervising Deputy Attorneys General
Heidi Lehrman*
Jeanelly Orozco Alcalá*
Natasha A. Reyes*
Deputy Attorneys General
1300 I Street
Sacramento CA 95814
Heidi.Lehrman@doj.ca.gov
Michael.Newman@doj.ca.gov
Neli.Palma@doj.ca.gov
Kathleen.Boergers@doj.ca.gov
Srividya.Panchalam@doj.ca.gov
Jeanelly.OrozcoAlcala@doj.ca.gov
Natasha.Reyes@doj.ca.gov

Attorneys for the State of California

KATHLEEN JENNINGS

Attorney General of the State of Delaware

By: /s/ Vanessa L. Kassab
Ian R. Liston
Director of Impact Litigation
Vanessa L. Kassab
Deputy Attorney General
Rose Gibson
Assistant Attorney General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
(302) 683-8899
vanessa.kassab@delaware.gov

Attorneys for the State of Delaware

BRIAN L. SCHWALB

Attorney General for the District of
Columbia

By: /s/ Mitchell P. Reich
Mitchell P. Reich

WILLIAM TONG

Attorney General for the State of
Connecticut

By: /s/ Patricia McCooey
Patricia McCooey*
Assistant Attorney General
165 Capitol Ave
Hartford, CT 06106
(860) 808-5210
Patricia.McCooey@ct.gov

Attorney for the State of Connecticut

KWAME RAOUL

Attorney General for the State of Illinois

By: /s/ Sarah J. North
Sarah J. North*

Senior Counsel to the Attorney General
Office of the Attorney General for the
District of Columbia
400 Sixth Street, NW
Washington, D.C. 20001
(202) 279-1261
mittchell.reich@dc.gov

Attorney for the District of Columbia

Deputy Division Chief, Public Interest
Division
Holly Berlin*
Assistant Attorney General, Special
Litigation Bureau
Alexandra Reed*
Assistant Attorney General, Civil Rights
Bureau
R. Henry Weaver*
Assistant Attorney General, Special
Litigation Bureau
Office of the Illinois Attorney General
115 S. LaSalle Street
Chicago, IL 60603
312-814-3000
Sarah.North@ilag.gov
Holly.Berlin@ilag.gov
Alexandra.Reed@ilag.gov
Robert.Weaver@ilag.gov

Attorneys for the State of Illinois

ANTHONY G. BROWN
Attorney General for the State of Maryland

By: /s/ Virginia A. Williamson
Virginia A. Williamson*
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
410-576-6584
VWilliamson@oag.state.md.us

Attorney for the State of Maryland

ANNE E. LOPEZ
Attorney General for the State of Hawai‘i

By: /s/ Kaliko‘onālani D. Fernandes
David D. Day*
Special Assistant to the Attorney General
Kaliko‘onālani D. Fernandes*
Solicitor General
425 Queen Street
Honolulu, HI 96813
(808) 586-1360
david.d.day@hawaii.gov
kaliko.d.fernandes@hawaii.gov

Attorneys for Plaintiff State of Hawai‘i

DANA NESSEL
Attorney General of Michigan

By: /s/ Neil Giovanatti
Neil Giovanatti*
Bryan Beach*
Assistant Attorneys General

AARON M. FREY
Attorney General for the State of Maine

By: /s/ Brendan Kreckel
Brendan Kreckel*
By: /s/ Kristin Trabucchi
Kristin Trabucchi*

Michigan Department of Attorney General
525 W. Ottawa
Lansing, MI 48909
(517) 335-7603

GiovanattiN@michigan.gov
BeachB@michigan.gov

Attorneys for the State of Michigan

AARON D. FORD

Attorney General for the State of Nevada

By: /s/ Heidi Parry Stern

Heidi Parry Stern*

Solicitor General

Office of the Nevada Attorney General

1 State of Nevada Way, Ste. 100

Las Vegas, NV 89119

HStern@ag.nv.gov

Attorney for the State of Nevada

RAÚL TORREZ

Attorney General for the State of New Mexico

By: /s/ Mark Noferi

Mark Noferi*

Senior Litigation Counsel

NM Department of Justice

408 Galisteo Street

Santa Fe, New Mexico 87501

(505) 490-4060

MNoferi@nmdoj.gov

Attorney for the State of New Mexico

Assistant Attorneys General
Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006

Tel.: 207-626-8800

Fax: 207-287-3145

Brendan.kreckel@maine.gov

kristin.k.trabucchi@maine.gov

Attorneys for the State of Maine

ANDREA JOY CAMPBELL

Attorney General of Massachusetts

By: /s/ David Ureña

Katherine Dirks

Chief State Trial Counsel

Ethan W. Marks*

David Ureña*

Brett M. Gannon*

Assistant Attorneys General

Office of the Massachusetts Attorney General

1 Ashburton Place Boston, MA 02108

(617) 963-2675

david.urena@mass.gov

Attorneys for the Commonwealth of Massachusetts

KEITH ELLISON

Attorney General for the State of Minnesota

By: /s/ Joseph R. Richie

Joseph R. Richie*

Special Counsel

445 Minnesota Street, Suite 1400

St. Paul, Minnesota, 55101

(651) 300-0921

joseph.richie@ag.state.mn.us

Attorney for the State of Minnesota

CHARITY R. CLARK

Attorney General for the State of Vermont

By: /s/ Ryan P. Kane

Ryan P. Kane*

Deputy Solicitor General

109 State Street

Montpelier, VT 05609

(802) 828-2153

Ryan.kane@vermont.gov

Attorney for the State of Vermont

JOSHUA L. KAUL

Attorney General for the State of Wisconsin

By: /s/ Faye B. Hipsman

Faye B. Hipsman*

Assistant Attorney General

Wisconsin Department of Justice

Post Office Box 7857

Madison, Wisconsin 53707-7857

608-264-9487

faye.hipsman@wisdoj.gov

Attorney for the State of Wisconsin

MATTHEW J. PLATKIN

Attorney General of New Jersey

By: /s/ Meghan Musso

Meghan Musso*

Patrick Clancey*

Kathleen Riley*

Deputy Attorneys General

Office of the Attorney General

25 Market Street

Trenton, NJ 08625

(609) 696-5289

meghan.musso@law.njoag.gov

Attorneys for the State of New Jersey

DAN RAYFIELD

Attorney General for the State of Oregon

By: /s/ Coby Howell

Coby Howell*

Senior Assistant Attorney General

Tel (971) 673-1880

Fax (971) 673-5000

coby.howell@doj.oregon.gov

Attorney for the State of Oregon